

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION

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OFFICE OF THE  
SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

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**INTERROGATORIES OF UNITED PARCEL SERVICE  
TO PARCEL SHIPPERS ASSOCIATION WITNESS ZWIEG  
(UPS/PSA-T3-1 through 3)**

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(January 20, 1998)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to Parcel Shippers Association witness Zwieg (UPS/PSA-T3-1 through 3).

Respectfully submitted,

  
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**INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO PARCEL SHIPPERS ASSOCIATION WITNESS ZWIEG**

**UPS/PSA-T3-1.** Please refer to page 3, Table 1, of your testimony.

(a) The second column is titled "Average number of days from the facility to home." Please confirm that the "facility" referred to is a BMC in the first row, and SCF in the second row. If not confirmed, please explain to what "facility" refers.

(b) Please confirm that the BMC row should be interpreted to mean that it takes an average of 7.93 days from the time mail is entered at the BMC to the time of final delivery.

**UPS/PSA-T3-2.** Please identify and provide any documents that describe or analyze in more detail your seed tracking program.

**UPS/PSA-T3-3.** What is the source of the figures in Tables 2, 3, 4, and 5?

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
Stephanie Richman

Dated: January 20, 1998  
Philadelphia, PA